



CORNERSTONE

Environmental Group, LLC

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VIA E-MAIL AND US MAIL

September 7, 2012

Mr. Jonathan Gorin
Remedial Project Manager
United States Environmental Protection Agency, Region II
290 Broadway
19th Floor
New York, New York 10007-1866

RECEIVED
SEP 11 2012

Subject: Monthly Progress Report for August 2012
LCP Chemicals, Inc. Superfund Site (USEPA ID# NJD079303020)

Dear Mr. Gorin:

The following monthly progress report is submitted on behalf of ISP Environmental Services Inc. (IES) in satisfaction of the Section VIII.35 requirements of Administrative Order No. II CERCLA-02-99-2015 (hereinafter referred to as the Order) issued by USEPA and as executed by IES on May 13, 1999.

A "Gantt Chart" project schedule is provided as an attachment (Figure 1). This project schedule provides graphical representations of the project tasks and subtasks. Accordingly, the project schedule depicts the task completion through the end of the reporting month and provides an estimate of the timing of future tasks.

1. Previous Actions in Compliance with the Order

A. The following actions have been taken to comply with the Order during the previous month:

- Continued coordination with the USEPA on resolving comments on the *Draft Remedial Investigation Report*.
- Continued coordination with the USEPA on the Agency's review of the revised *Draft Remedial Investigation Report* that incorporated the results of the investigation of off-site ditches, and the *Draft Feasibility Study*.
- Completed additional FS narrative and tables to address USEPA's preliminary comments regarding Chemicals of Potential Concern (COPCs), Preliminary Remediation Goals (PRGs), and Principal Threat Waste (PTW).

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B. The following documents were submitted to the agencies during the previous month:

- Monthly progress letter report dated August 7, 2012, including an updated project schedule dated August 2, 2012.
- Draft edits to various FS report sections and accompanying tables regarding COPCs, PRGs, and PTW, submitted to the USEPA via electronic mail, on August 9, 2012.
- A proposed agenda for the planned RI/FS review meeting scheduled for September 11, 2012, provided via electronic mail on August 27, 2012.

C. The following agency approvals were received during the previous month:

- None during the reporting period.

D. The following agency documents and correspondences were received during the previous month:

- None during the reporting period.

E. Other pertinent communications with the agencies during the previous month:

- Electronic mail message from Jonathan Gorin of the USEPA to David McNichol and Carrie McGowan of IES, dated August 23, 2012, transmitting comments from the NJDEP on the text and tables prepared regarding COPCs, PRGs, and PTW.
- Electronic mail message from Jonathan Gorin of the USEPA to David McNichol and Carrie McGowan of IES, dated August 15, 2012, transmitting comments from the USEPA BTAGs on IES's prior responses to the BERA comments.
- Site meeting with USEPA, IES, and Praxair to discuss replacement of Praxair nitrogen line which is installed across LCP. Parties discussed and considered alternatives. Praxair to return with a specific proposal.

2. Future Actions, Data, and Plans

A. The following actions, data, and plans are scheduled to be conducted during the following two (2) months contingent on the USEPA's schedule for resolving comments on previously-submitted documents:

- Continue work on resolving comments from the USEPA on the *Draft Remedial Investigation Report* submitted by IES.
- Continue work on resolving comments from the USEPA on the *Draft Baseline Ecological Risk Assessment* submitted by IES.

- Continue work on resolving comments from the USEPA on the revised *Draft Remedial Investigation Report* that incorporated the results of the investigation of off-site ditches.
- Continue work on resolving comments from the USEPA on the *Draft Feasibility Study* report.
- Participate in a meeting with representatives of the USEPA and the NJDEP, scheduled for September 11, 2012, to discuss comments on the RI and the FS.

B. Other information related to the progress of work:

- None during this reporting period.

3. Project Schedule

- A. The percentage of completion of the project subtasks has been updated and is shown on the overall project schedule (Figure 1). Many of the schedule subtask details including the Phase I and Phase II RI field investigations and the treatability study determination process are 100% complete and have been collapsed for presentation brevity on Figure 1. With the submittal to the USEPA of the revised draft RI report and the draft FS report, the schedule is controlled by the USEPA review process. Coordination with the USEPA is ongoing regarding the review process. A meeting is scheduled for September 11, 2012 to discuss the ongoing review process for the RI and the FS. Since this meeting will occur in mid-September, it is not considered probable that the RI and FS review process could be completed by the end of September as was projected in the schedule submitted with the July 2012 progress report. The schedule has, therefore, been updated, to provide an additional approximately two months following this meeting, to conclude the review process. As the time necessary to complete the review process is further defined, the schedule will be updated accordingly.
- B. Delays that have been encountered or anticipated that may affect the future schedule for completion of the work:
- No specific delays are being encountered at this time, and the current schedule reflects the completion of draft RI and FS reports, as described above. However, responses are still pending from the USEPA on the remaining comments on the RI and the ecological risk assessment; and resolution of comments are pending on the revised RI and draft FS.
- C. Description of efforts made to mitigate these delays or anticipated delays:
- None necessary at this time.

4. Funding Mechanism

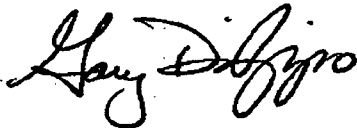
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- A. An Irrevocable Letter of Credit No. P-224827, issued by JP Morgan Bank effective April 25, 2002, and associated Standby Trust Agreement were issued in satisfaction of the financial assurance obligations of the Order as documented to USEPA in a letter from Celeste Wills, Esq. of IES, dated April 26, 2002.

If you or your staff has any questions or comments, please do not hesitate to contact David McNichol of IES at 973-628-3355.

Sincerely,

CORNERSTONE ENVIRONMENTAL GROUP, LLC

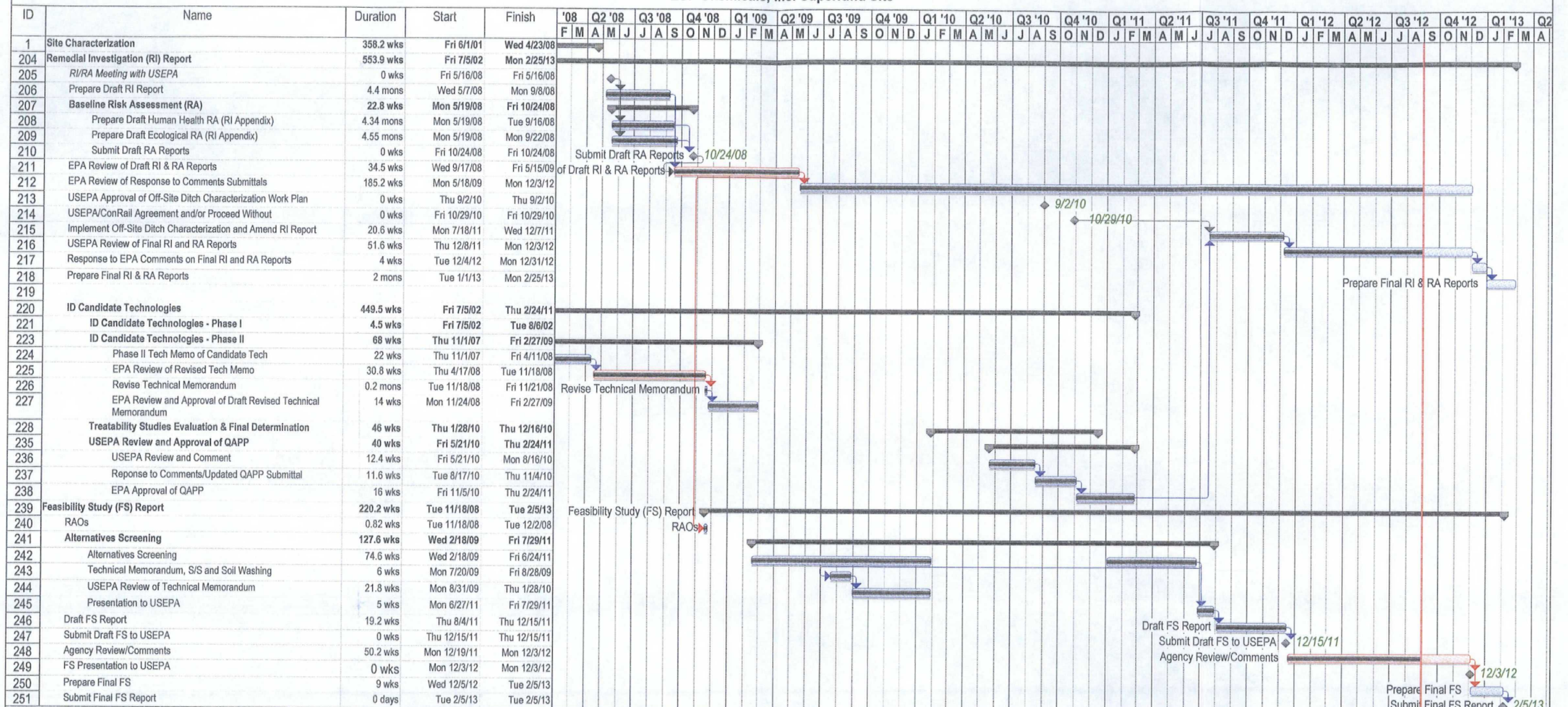


Gary J. DiPippo, P.E.
Manager, Hydrogeology and Remediation

Enclosure

cc: S. Miller, NJDHSS	C. McGowan, IES
F. Cardiello, Esq., USEPA	S. MacMillin, Brown and Caldwell
D. McNichol, IES	K. Tolson, Geosyntec
D. Toft, Esq.	M. DeFlaun, Geosyntec
A. Pavelka, NJDEP	J. Kubitz, Entrix
R. Lampkin, Ashland	

Figure 1
R/FS PROJECT SCHEDULE
LCP Chemicals, Inc. Superfund Site



Task  Progress  Milestone  Summary 